

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

LLOYD NAPIER,

Plaintiffs,

v.

BROCK & COMPANY, INC.; KEITH
LONG; DAVID GRANT; ABC
CORPORATIONS 1-5 (fictitious names
describing presently unidentified business
entities); and JOHN DOES 1-5 (fictitious
names describing presently unidentified
individuals),

Defendants.

Case No. 1:25-cv-01573

JURY TRIAL DEMANDED

STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff Lloyd Napier and Defendants Brock & Company, Inc., Keith Long, and David Grant (collectively, “Defendants”) by and through their undersigned attorneys, hereby stipulate and agree that the time for Defendants to answer Plaintiff’s Complaint is hereby extended for a period of time up to and including April 16, 2025.

WHEREFORE, the parties respectfully request that the Court approve this stipulation.

**McOMBER McOMBER
& LUBER, PC**

/s/ Anna F. Esposito

Christian V. McComber, Esquire
Peter D. Valenzano, Esquire
Anna F. Esposito, Esquire
Christian J. Fechter, Esquire
*Counsel for Plaintiff,
Lloyd Napier*

Dated: April 9, 2025

KAUFMAN DOLOWICH LLP

/s/ Gregory Hyman

Gregory S. Hyman, Esquire
Counsel for Defendants,
Brock & Company, Inc., Keith Long,
and David Grant

Dated: April 9, 2025

SO ORDERED:



ANN MARIE DONIO, U.S.M.J.

4/9/2025